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January 19, 2023

VIA ECF

United States District Court Western District of New York
100 State Street
Rochester, New York 14614
Attention: The Honorable Judge David G. Larimer

Re: Mark Militello, et al v. Ford Motor Company
Our File No.: 5003.066
Case Number: 22-cv-06425

Dear Judge Larimer:

Our office has been retained to represent the interests of Ford Motor Company (hereinafter “Ford”) in the above referenced matter. Please permit this to serve as a joint correspondence on behalf of both Parties.

This matter was filed in this Court on October 5, 2022. Thereafter, the Plaintiff served Ford Motor Company on January 3, 2023. Ford’s response to the Complaint currently is due on January 24, 2023. Counsel for the parties have met and conferred and counsel for Ford has advised Plaintiff’s counsel of its intent to file a Pre-Answer motion to transfer.

In the interest of efficiency for the Court and Parties, the Parties have agreed as follows regarding the briefing on that motion and on Ford’s time to respond to the Complaint, and respectfully request the Court approve their proposed schedule:

- a) Pre-Answer Motion to Transfer to be filed by February 7, 2023;
- b) Plaintiff’s Opposition to be filed by March 7, 2023;
- c) Ford’s Reply Brief to be filed by March 21, 2023; and
- d) Ford’s Answer or Rule 12 Motion due 30 days after either: i) date of filing Plaintiff’s Complaint in the transferee court (if transfer granted), or else ii) date of order denying transfer.

Counsel for Ford also respectfully requests oral argument on its motion to transfer on a date to be set by the Court.

If approved by the Court, Ford’s notice of motion will delineate the above briefing schedule.

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Thank you for considering the Parties' request.

Very truly yours,

Aaronson Rappaport Feinstein & Deutsch, LLP

Peter J. Fazio

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Cc: VIA ECF

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